

**REMARKS**

Favorable reconsideration and allowance of the present application are respectfully requested in view of the following remarks. Claims 1-22 remain pending.

**ALLOWABLE SUBJECT MATTER**

Applicant appreciates that claims 2, 4-13, 15, 17, and 19-22 are indicated to be allowable.

**§ 102 REJECTION – HIRABAYASHI**

Claims 1, 3, 14, 16, and 18 stand rejected under 35 USC 102(b) as allegedly being anticipated by Hirabayashi et al. (USP 5,680,225) hereinafter “Hirabayashi”. Applicant respectfully traverses.

For a Section 102 rejection to be proper, the cited reference must teach or suggest each and every claimed element. *See M.P.E.P. 2131; M.P.E.P. 706.02.* Thus, if the cited reference fails to teach or suggest one or more elements, then the rejection is improper and must be withdrawn.

In this instance, Hirabayashi fails to teach or suggest each and every claimed element. For example, independent claim 1 recites, in part, “carrying out a first, initial image conversion, without previously enlarging which controls said original image data to said predetermined number of pixels, by obtaining, by a first interpolation calculation, image data represented

by a number of pixels which is one-half of the predetermined number of pixels, from the original image data represented by the predetermined number of pixels.” Independent claims 14 and 18 also recite similar features.

The Examiner states that the enlarged image in Hirabayashi is treated as the original image as claimed. As discussed in previous replies, this is an unreasonable position since the enlarged image of Hirabayashi is clearly contrary to the recited feature of “without previously enlarging which controls said original image data to said predetermined number of pixels.”

However, for the sake of argument, Applicant treats the enlarged image of Hirabayashi as the original data. *See Figure 7B*. As seen in Hirabayashi, the enlarged image is reduced, in number of pixels, by half in both horizontal and vertical directions. *See Figure 7C*. Thus, after the first reduction, the reduced image of Figure 7C is one fourth (1/4) the size of the enlarged image of Figure 7B.

This is clearly contrary to the feature of reducing by one half the number of pixels as recited in the claims. Thus, even under the unreasonable interpretation that the enlarged image of Hirabayashi is equivalent to the original image as claimed, Hirabayashi still cannot be relied upon to teach or suggest all features of the claims.

For at least the reasons stated above, independent claims 1, 14 and 18 are distinguishable over Hirabayashi. Claims 3 and 16 depend from independent claims 1 and 14, respectively. Therefore, for at least the reasons

stated above with respect to independent claims 1 and 14, claims 3 and 16 are also distinguishable over Hirabayashi.

Applicant respectfully requests that the rejection of claims 1, 3, 14, 16, and 18 based on Hirabayashi be withdrawn.

### **CONCLUSION**

All objections and rejections raised in the Final Office Action having been addressed, it is respectfully submitted that the present application is in condition for allowance. Should there be any outstanding matters that need to be resolved, the Examiner is respectfully requested to contact Hyung Sohn (Reg. No. 44,346), to conduct an interview in an effort to expedite prosecution in connection with the present application.

Pursuant to 37 C.F.R. §§ 1.17 and 1.136(a), the Applicant respectfully petitions for a three (3) month extension of time for filing a response in connection with the present application and the required fee of \$1020 is being filed concurrently herewith.


If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

BIRCH, STEWART, KOLASCH & BIRCH, LLP

By: 

D. Richard Anderson  
Reg. No. 40,439

  
DRA/HNS  
1982-0136P

P.O. Box 747  
Falls Church, VA 22040-0747  
(703) 205-8000